



April 27, 2015

Steve Daniel, President  
West Georgia Technical College  
176 Murphy Campus Boulevard  
Waco, Georgia 30182 6476

UPS# 1ZA879640291516578

RE: **Final Program Review Determination**  
OPE ID: 010487  
PRCN: 2014-3-04-28631

Dear Mr. Daniel:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta, issued a program review report on August 13, 2014 covering West Georgia Technical College's (WGTC's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2012-2013 and 2013-2014 award years. WGTC's final response was received on February 2, 2015. A copy of the program review report (and related attachments) and WGTC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by WGTC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

**Purpose:**

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department and (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are **\$75,290**.

This final program review determination contains detailed information about the liability determination for all findings.

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals

and may lead to identity theft or other fraudulent use of the information. PII is contained in Appendices A, B, C and D.

#### **Appeal Procedures:**

This constitutes the Department's FPRD with respect to the liabilities identified from the August 13, 2014 program review report. If WGTC wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date WGTC receives this FPRD. An original and four copies of the information WGTC submits must be attached to the request. The request for an appeal must be sent to:

Robin Minor, Director (Acting)  
Administrative Actions and Appeals Service Group  
U.S. Department of Education  
Federal Student Aid/PC  
830 First Street, NE - UCP3, Room 84F2  
Washington, DC 20002-8019

WGTC's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

---

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to WGTC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

#### **Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the

end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Angelique James at 404-974-9441. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Chris Miller  
Division Director

Enclosure:

Protection of Personally Identifiable Information  
Program Review Report (and appendices)  
Final Program Review Determination Report (and appendices)

cc: Anna English, Financial Aid Administrator  
GA Technical College System of Georgia  
GA Board of Nursing  
Southern Association of Colleges and Schools Commission on Colleges  
Department of Defense  
Department of Veterans Affairs  
Consumer Financial Protection Bureau

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

---

PII data cannot be sent via fax.

Prepared for  
**West Georgia Technical College**

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of  
the AMERICAN MINI

OPE ID 010487  
PRCN 2014-3-04-28631

Prepared by  
U.S. Department of Education  
Federal Student Aid  
School Participation Division - Atlanta

## Final Program Review Determination April 27, 2015

---

Federal Student Aid, School Participation Division - Atlanta  
61 Forsyth Street SW, Room 18140, Atlanta, GA 30303  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

## Table of Contents

	Page
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings and Final Determinations.....	3
Resolved Findings	
Resolved Finding with Comments	
Finding 7: Exit Counseling Deficiencies	
Findings with Final Determinations	
Finding 1: Unofficial Withdrawal Policy not Adequately Developed	
Finding 2: FWS Violations-Student Working during class hours	
Finding 6: FWS Violations -Timesheet Violations/ Improper Payment	
D. Summary of Liabilities.....	11
E. Payment Instructions.....	12
F. Appendices	16
Appendix A: Student Sample	
Appendix B: Student Specific Liabilities - Pell	
Appendix C: Student Specific Liabilities- Sub	
Appendix D: Student Specific Liabilities – Unsub	
Appendix E: Student Specific Liabilities - FWS	
Appendix F: Program Review Report	
Appendix G: Institution's Written Response	
Appendix H: Cost of Funds	

---

**A. Institutional Information**

West Georgia Technical College  
176 Murphy Campus Boulevard  
Waco, GA 30182 - 6476

Type: Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 6,500 (2013-2014)

% of Students Receiving Title IV: 83% (2013-2014)

Title IV Participation: Postsecondary Education Participants System (PEPS):

2012-2013 Award Year

Federal Pell Grant Program (Pell)	\$10,461,459
Federal Supplemental Education Opportunity Grant (SEOG)	\$199,333
Federal Work Study (FWS)	\$189,457
William D. Ford Direct Loan Program (Direct Loan)	\$9,861,344

Default Rate FFEL/DL*:	2011 No Rates Available
	2010 No Rates Available
	2009 No Rates Available

***\*Note: The institution's first year of participation in Direct Loans was in the 2011/2012 award year.***

---

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at West Georgia Technical College (WGTC) from June 16, 2014 to June 20, 2014. The review was conducted by Angelique James.

Based upon an analysis of the Department's data (graduation and withdrawal data from National Student Loan Data System - NSLDS and Integrated Postsecondary Education Data System - IPEDS), the Department determined that WGTC had a high annual dropout rate. A random sample of 15 files was selected for review in the 2012-2013 and 2013-2014 (year to date) award years. Appendix A lists the names and partial social security numbers of the 30 students whose files were examined during the program review.

In addition, 2 files were randomly selected from a list provided by WGTC on site of all students receiving FWS funds. Appendix A lists the names and partial social security numbers of the 2 students (student #31 and #32) whose files were examined during the program review.

## **C. Findings and Final Determinations**

### **Resolved Findings**

Findings 2, 3, 6, 8, 9, 10, 11, 12

WGTC has taken the corrective actions necessary to resolve findings 2, 3, 6, 8, 9, 10, 11 and 12 of the program review report. Therefore, these findings may be considered closed. Findings requiring further action by WGTC are discussed below.

### **Resolved Finding with Comments**

#### **Finding 7: Exit Counseling Deficiencies**

---

*Citation: 34 C.F.R. § 685.304 (b) states that an Institution must ensure that exit counseling is conducted with each Stafford loan borrower either in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that this counseling is conducted shortly before the student borrower ceases at least half-time study at the school, and that an individual with expertise in the title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. If a student borrower withdraws from school without the school's prior knowledge or fails to complete an exit counseling session as required, the school must ensure that exit counseling is provided through either interactive electronic means or by mailing written counseling materials to the student borrower at the student*



*borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required.*

**Noncompliance:** *There was no exit counseling documentation in the file for student #3, #4, #8, #12, #15, #19, #23, and #24. The institutions academic year is standard terms (Fall/Spring/Summer) for 38 weeks. The FAD stated that students that attend the Fall and Spring semester but do not attend the Summer semester were assumed to be returning in the Fall even though they had not registered. The reviewers informed the staff that if the student had attended the Fall and Spring semester but had not registered for the Summer, the student should be considered a withdrawn student and exit counseling must be completed within 30 days.*

**Required Action:** *WGTC was required to provide documentation that exit counseling had been conducted for the students listed above (student #3, #4, #8, #15, #19, #23, and #24). This documentation was to be provided to this office with WGTC's response to this finding.*

**WGTC's Response:** WGTC states that it is now conducting exit counseling for all semesters which include Fall, Spring and Summer semesters. WGTC also submitted exit counseling documentation dated March 4, 2015 for students #3, #4, #8, #15, #19, #23 and #24.

**Final Determination:** WGTC did not timely conduct exit counseling for students that attended the Fall and Spring semester but did not attend the Summer semester. In the future, WGTC must ensure that exit counseling is provided through either interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

#### **Findings with Final Determinations**

---

##### **Finding 1: Unofficial Withdrawal Policy not Adequately Developed**

**Citation:** *When a recipient of Title IV grant or loan funds withdraws from a school (officially or unofficially) after beginning attendance, the amount of Title IV funds earned by the student must be determined. R2T4 calculations are based on a statutory formula developed by the Department and must be used on all recipients of FSA funds. The formula is based, in part, on the amount of time a student actually spent in attendance at the school. If the amount disbursed to the student is greater than the amount the student earned, unearned funds must be returned no later than 45 days after the date the institution determined that the student withdrew. If the amount disbursed to the student is less than the amount the student earned, and for which the student is otherwise eligible,*

*the student may be eligible to receive a post-withdrawal disbursement of the earned aid not received. See 34 § C.F.R. 668.22*

*The withdrawal date for a student who ceases attendance at an institution that is not required to take attendance is:*

- The date, as determined by the institution, that the student began the withdrawal process or provided official notification to the institution, in writing or orally, of his or her intent to withdraw;*
- If the student ceases attendance without providing official notification to the institution of his or her withdrawal, the mid-point of the payment period; or*
- If the institution determines that a student did not begin the withdrawal process or otherwise provide official notification of his or her intent to withdraw because of illness, accident, grievous personal loss, or other such circumstances beyond the student's control, the date that the institution determines is related to that circumstance.*

*With respect to unofficial withdrawals, DCL GEN-04-03 dated November 2004 states that schools must have a procedure for determining whether a Title IV recipient who began attendance during the period actually completed the period, or if the recipient should be treated as a withdrawal. If a student earns a passing grade in one or more of his/her classes during the period for that class, the school can presume that the student completed the course, and thus the period. However, if a student who began attendance and did not officially withdraw fails to earn a passing grade in at least one course offered over an entire period, the school must assume, for Title IV purposes, that the student has unofficially withdrawn (unless the school can document that the student completed the period). When a student unofficially withdraws from an institution that is not required to take attendance, the institution may use either the student's last date of attendance (LDA) at an academically related activity or the midpoint of the payment period as the student's withdrawal date.*

**Noncompliance:** *WGTC's unofficial withdrawal policy was not adequately developed. WGTC's withdrawal policy concerning unofficial withdrawals states:*

*"Students receiving Title IV funds (Pell and FSEOG) who completely withdraw from all classes during the semester are subject to a refund of a portion of the award. The percentage of the award to be refunded will depend on the student's formal withdrawal date, or the last recorded date of class attendance provided by their instructor, if the student drops without filing the drop formal paperwork."*

*WGTC's grade point average description states:*

*W (Withdraw) – This grade signifies that a student has officially withdrawn by the midpoint of semester.*

*WF (Withdraw Failing) – This grade indicates that a student officially withdrew after the midpoint of the semester.*

*WP (Withdraw Passing) – This grade of WP is given only to students with extenuating circumstances. This grade indicates that a student was passing when he or she officially withdrew after the midpoint of the semester.*

*WGTC was not required to take attendance by any outside agency, nor were faculty required to take attendance by the institution's policies or procedures. Also, since there were no grade descriptions for students who unofficially withdrew, the reviewers were not clear on how the institution determined grades for these students. The school did not have a policy to determine the last date of attendance for a student who began attendance and did not officially withdraw and failed to earn a passing grade in at least one course.*

*There were 2 students in our sample who failed to earn a passing grade in at least one course and the reviewers could not determine if the student actually completed the period, or if the recipient should be treated as a withdrawal:*

*Student 25: In the Spring 2014 semester, student #25 was enrolled in 4 classes and withdrew from 3 of those classes. For the withdrawn classes, the student received 2 "W"'s and 1 "WF". In one class, the instructor gave the student a grade of "F" on May 6, 2014. WGTC could not produce any documentation to support the "F" grade. There was no R2T4 worksheet in the student's file. Student #25 received \$1,882 in Pell grant funds.*

*Student 26: In the Summer 2013 semester, student #26 was enrolled in 4 classes and withdrew from 1 of those classes. For the withdrawn class, the student received a "W" grade. In the other 3 classes, the instructors gave the student grades of "F". WGTC could not produce any documentation to support the "F" grades. There was no R2T4 worksheet in the student's file. Student #25 received \$1,850 in Pell grant funds.*

---

**Required Action:** *WGTC was required to perform a 100% file review of all of the Title IV recipients who failed to earn a passing grade in at least one course for the 2013-2014 award year and identify if the recipient should have been treated as a withdrawal.*

*WGTC was also required to update its withdrawal policy to include a revised policy for unofficial withdrawals to reflect the requirements of DCL GEN-04-03.*

**WGTC's Response:** *WGTC states that the attendance policy and process has been updated. The new policy now states that the grade of withdraw passing (WP) or withdraw failing (WF) will be assigned after the withdrawal date of the semester. The grade of WP is given only to students with extenuating circumstances. The "F" grades will be added to*

the financial aid report as a part of the R2T4 withdrawal calculations. The financial aid office will process the "F" grades and their last date of attendance for financial aid eligibility.

According to WGTC, all instructors are now required to take attendance daily in all courses. If the student is not attending the course and does not withdraw, then the instructor will withdraw the student. At that time, the last of day in attendance will be forwarded to the Registrar's Office. The last date recorded by the instructor of an online course will be the last date of an academically related activity as stated in the new attendance policy. To ensure compliance, attendance records will be audited monthly by each campus's administration (Appendix G).

**Final Determination:** WGTC's unofficial withdrawal policy was not adequately developed concerning unofficial withdrawals. WGTC was not able to identify recipients who failed to earn a passing grade in at least one course to determine if the recipient should have been treated as a withdrawal. WGTC submitted a revised withdrawal policy along with the required file review for 2013-2014 (Appendices A, B and C). The liability from the file review is \$63,325 (includes \$33,400 in Pell and \$29,925 in Sub and Unsub Direct Loans – not including Cost of funds - Appendix H ).

**Note:** Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

#### **Finding 4: Federal Work Study Violations-Student Working during class hours**

**Citation:** Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program, an institution must pay a student FWS compensation at least once a month. It is the school's responsibility to monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

**Noncompliance:** The institution failed to monitor FWS time sheets adequately. Three out of 3 FWS students performed FWS jobs while scheduled for class as illustrated below:

**Student #28** For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 8/12/13 to 9/10/13 indicates that on 8/13/13 and 8/15/13, the student worked from 8:30am to 7:00pm and 9:30am to 7:00pm respectively. According to the class schedule, the student's class schedule was Tuesday and Thursday from 11:00am to 12:15pm.

*Student #31 For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 12/10/13 to 1/9/14 indicates that on 1/8/14, the student worked from 8:30am to 7:00pm. According to the class schedule, the student's class schedule was Monday and Wednesday from 11:00am to 12:15pm. Also, the time report form also showed that the student worked on 1/7/14 and 1/8/14 for 11.25 and 10.5 hours with no breaks.*

*Student #32 For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 11/11/13 to 12/9/13 indicates that on 11/12/13 and 11/14/13, the student worked from 8:30am to 7:00pm. According to the class schedule, the student's class schedule was Tuesday and Thursday from 11:00am to 12:15pm and 12:30pm to 1:45pm respectively.*

**Required Action:** *In its response, WGTC was required to provide documentation that the students listed above were not scheduled for classes while working a FWS job. Also WGTC was required to perform a full file review for all of the 2013-2014 FWS Recipients (including FWS students listed above) to identify all FWS students who worked during scheduled class hours.*

*Along with the file review, WGTC was required to develop a policy to ensure FWS students were not working during scheduled class times.*

**WGTC's Response:** WGTC states that the FWS procedure was changed for supervisors and students. The new process is that FWS supervisors must agree and sign a statement to maintain their work-study schedule when they are assigned a FWS worker, i.e., check weekly time sheets for accuracy, obtain a copy of their class schedule and make sure they do not schedule work hours that conflict with their class schedule (Appendix G). WGTC also submitted a file review for all of the 2012-2013 FWS Recipients to identify all FWS students who worked during scheduled class hours (Appendix E).

**Final Determination:** The institution failed to monitor FWS time sheets adequately which allowed students to perform FWS job duties while scheduled for class. Along with revised their FWS policy, WGTC submitted a full file review for all of the 2013-2014 FWS Recipients who worked during scheduled class hours. The file review determined that the amount of FWS federal funds paid while students were scheduled for classes in 2012-2013 was \$11,246 (Appendix E). The file review did not include the students identified in the sample (#28, #31, #32). For students in the reviewer's sample (#28, #31 and #32), the total amount of 2013-2014 FWS funds paid while scheduled for classes is \$56.25 (Table 1).

**Note:** WGTC was granted a waiver of the institutional requirement for the 2012-2013 and 2013-2014 award years.

Award Year	Sample Student #	FWS Rate per Hour	Hours Worked during Scheduled Class	Total FWS Paid while Scheduled for Class
2013-2014	28	\$9.00	2.50	\$22.50
2013-2014	31	\$9.00	1.25	\$11.25
2013-2014	32	\$9.00	2.50	\$22.50
			<b>TOTAL</b>	<b>\$56.25</b>

Table 1

**Finding 5: Federal Work Study Violations -Timesheet Violations/ Improper Payment to Students**

**Citation:** Pursuant to 34 C.F.R. § 675.16, the institution must make direct Federal Work Study (FWS) payments to students and handle the return of FWS funds that are not received or negotiated by a student. Regardless of who employs the student, the institution is responsible for ensuring that the student is paid for work performed. A student's FWS compensation is earned when the student performs the work.

**Noncompliance:** The institution failed to monitor FWS time sheets adequately. Time sheet hours were not accurately calculated.

**Student 28:** The student's payroll time sheet for the week of 6/11/13 to 6/19/13 shows hours worked of 3.5 on 6/13/13; however the student worked from 8:30 am to 1:00pm which is 4.5 hours.

**Student 31:** The student's payroll time sheet for the week of 11/10/13 to 12/8/13 shows hours worked of 8.25 on 11/12/13 and 11/13/13; however the student worked from 8:30 am to 5:40pm which is 8.16 hours.

**Required Action:** In its response, WGTC was required to provide documentation to resolve the time sheet discrepancies listed above.

WGTC was required to also prepare federal work study procedures on how to address monitoring FWS time sheets. These procedures were to include financial aid's role in FWS monitoring of timesheets and disbursement of funds. This policy was to also address how such errors as the ones listed above will be handled if identified in the future. A

*copy of these new procedures were to be submitted to this office in response to this finding.*

**WGTC's Response:** WGTC updated its federal work student policy to state that an excel spreadsheet had been created that will calculate the total time worked for FWS students. WGTC states that this action should prevent calculation errors from occurring in the future. WGTC concurs that student #28 is owed for 1 hour pay due to a miscalculation of FWS hours. WGTC also concurs that student #31 was overpaid by 10 minutes in FWS funds.

**Final Determination:** The institution failed to monitor FWS time sheets adequately for students #28 and #31. WGTC is required to pay student #28 \$9.00 for hours worked. The liability for student #31 is minimal and will not be required to be returned to the Department; however, WGTC must remember that it is responsible for ensuring that students must be paid for work at the time when the student performs the work.

### D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows.

Liabilities	Pell (Closed Award Year)	FWS <sup>1</sup>	DL	Total
Finding 1	\$33,400	\$0	\$29,925	
Finding 4	\$0	\$11,302	\$0	
Finding 5	\$0	\$9	\$0	
<b>Subtotal</b>	<b>\$33,400</b>	<b>\$11,311</b>	<b>\$29,925</b>	
Interest/SA	\$256	\$147	\$251	
<b>TOTAL</b>	<b>\$33,656</b>	<b>\$11,458</b>	<b>\$30,176</b>	
<b>Payable To:</b>				<b>Totals</b>
Department	\$33,656	\$11,449	\$30,176	<b>\$75,281</b>
Student (Finding 5)		\$9		\$9
<b>Grand Total</b>				<b>\$75,290</b>

<sup>1</sup> WGTC was granted a waiver of the institutional requirement for the 2012-2013 and 2013-2014 award years.



### **E. Payment Instructions**

#### **1. Liabilities Owed to the Department**

WGTC owes to the Department **\$75,290**. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education  
P.O. Box 979026  
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

***Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).***

The following identification data must be provided with the payment:

**Amount:** \$75,290  
**DUNS:** 833122976  
**TIN:** 581656795  
**Program Review Control Number:** 2014-3-04-28631

#### **Terms of Payment**

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. WGTC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to WGTC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education  
OCFO Financial Management Operations  
Accounts Receivable Group  
550 12th Street, S.W., Room 6114  
Washington, DC 20202-4461

If within 45 days of the date of this letter, WGTC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due WGTC from the Federal Government. **WGTC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, WGTC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

Section II – Instructions by Title IV, HEA Program

2. Liabilities Owed to Students

Finding: 5

Student	
Amount	Award Year
\$9.00	2013-2014
Total \$9.00	

WGTC must make a good faith effort to pay the amount listed above to the student listed in the above Appendix. If WGTC cannot locate the student, payment must be made to the account of the program from which the award was made.

WGTC must provide proof of payment to the student by submitting a copy of the front and back of the canceled check to Angelique James **within 45 days of the date of this letter.**

In the event the student cannot be located, the student does not cash a check that has been mailed, and the institution is unable to initiate an EFT to the student's or parent's bank account, WGTC must return the funds to the FWS account. WGTC must document its attempts to contact the student and provide proof of payment. The Department will not consider this program review closed until the information requested has been received.

3. Liabilities Owed to the Department in the case of Direct Loans

**Direct Loan Closed Award Years (Request Extended Processing)**

Finding: 1

Appendices: B, C

WGTC must repay the following Direct Loan liabilities:

<b>DL Closed Award Year</b>		
Amount (Principal)	Amount (Interest)	Award Year
\$29,925	\$251	2013-2014
<b>Total Principal</b>	<b>Total Interest</b>	
\$29,925	\$251	

The disbursement record for each student identified in the appendices listed above must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the appendices. A copy of the adjustment to each student's COD record must be sent to Angelique James **within 45 days of the date of this letter**. The funds will be returned to the applicable G5 award for the applicable Title IV program.

4. Liabilities Owed to the Department in the case of Title IV Grants

**Pell – Closed Award Year**

Finding: 1

Appendix: B

WGTC must repay:

<b>Pell Closed Award Year</b>			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$33,400	\$256	Pell	2013-2014
<b>Total Principal</b>	<b>Total Interest</b>		
\$33,400	\$256		

The disbursement record for each student identified in the Appendix B to the applicable findings must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the Appendix B.

**Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.**

A copy of the adjustment to each student's COD record must be sent to Angelique James **within 45 days of the date of this letter.**

5. Campus Based Programs - FWS

WGTC must submit proof of the FISAP corrections and payment via G5 for any unprocessed deobligation (if applicable) to Angelique James **within 45 days of the date of this letter** (Appendix E).

## **Appendix F: Program Review Report**

---

**FYI**

August 13, 2014

Steve Daniel, President  
West Georgia Technical College  
176 Murphy Campus Boulevard  
Waco, Georgia 30182 6476

UPS# 1ZA879640294374047

RE: **Program Review Report**  
OPE ID: 010487  
PRCN: 2014-3-04-28631

Dear Mr. Daniel:

From June 16, 2014 through June 20, 2014, Angelique James conducted a review of West Georgia Technical College's (WGTC's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by WGTC. The response should include a brief, written narrative for each finding that clearly states WGTC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, WGTC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
  - a. A written statement addressing the institution's response;
  - b. A written statement of the basis for such report or determination; and
  - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by WGTC upon request. Copies of the program review report, the institution's

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

West Georgia Technical College  
OPE ID Number: 010487  
PRCN Number: 2014-3-04-28631  
Page 2 of 2

response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent by mail directly to Angelique James or by email at [angelique.james@ed.gov](mailto:angelique.james@ed.gov) **within 60 calendar days** of receipt of this letter.

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. Student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.


**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Angelique James at 404-974-9441 or [angelique.james@ed.gov](mailto:angelique.james@ed.gov).

Sincerely,

(b)(6)

 David Smittick  
Compliance Manager

cc: Anna English, Financial Aid Administrator

Enclosure:  
Protection of Personally Identifiable Information

Prepared for  
**West Georgia Technical College**

**Federal Student Aid**  
AN OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of  
the AMERICAN MIND™

OPE ID 010487  
PRCN 2014-3-04-28631

Prepared by  
U.S. Department of Education  
Federal Student Aid  
School Participation Division-Atlanta

## Program Review Report

August 13, 2014

---

Federal Student Aid, School Participation Division - Atlanta  
61 Forsyth Street SW, Room 18T40, Atlanta, GA 30303  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)

**Federal Student Aid**  
AN OFFICE of the U.S. DEPARTMENT of EDUCATION



Table of Contents		Page
A.	Institutional Information.....	3
B.	Scope of Review.....	4
C.	Findings .....	4
	Finding 1: Unofficial Withdrawal Policy Inadequate	
	Finding 2: Satisfactory Academic Policy not Monitored	
	Finding 3: Return to Title IV not Made	
	Finding 4: FWS Violations- Student Working During Class Hours	
	Finding 5: FWS Violations -Timesheet / Improper Payment to Students	
	Finding 6: Verification Violations	
	Finding 7: Exit Counseling Deficiencies	
	Finding 8: Satisfactory Academic Policy Inadequate	
	Finding 9: Late Enrollment Reporting to the NSLDS	
	Finding 10: Financial Aid Packaged Incorrectly/Full Eligibility not Awarded	
	Finding 11: Attendance Policy Inadequate	
	Finding 12: Bank Account not Designated as "Federal Funds" Account	
D.	Appendix A: Student Sample	20

**A. Institutional Information**

West Georgia Technical College  
176 Murphy Campus Boulevard  
Waco, GA 30182 - 6476

Type: Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 6,500 (2013/2014)

% of Students Receiving Title IV: 83% (2013/2014)

Title IV Participation: Postsecondary Education Participants System (PEPS):

2012-2013 Award Year

Federal Pell Grant Program (Pell)	\$10,461,459
Federal Supplemental Education Opportunity Grant (SEOG)	\$199,333
Federal Work Study (FWS)	\$189,457
William D. Ford Direct Loan Program (Direct Loan)	\$9,861,344

Default Rate FFEL/DL*:	2011 No Rates Available
	2010 No Rates Available
	2009 No Rates Available

*\*Note: The institution's first year of participation in Direct Loans was in the 2011/2012 award year.*

---

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at West Georgia Technical College (WGTC) from June 16, 2014 to June 20, 2014. The review was conducted by Angelique James.

Based upon an analysis of the Department's data (graduation and withdrawal data from National Student Loan Data System - NSLDS and Integrated Postsecondary Education Data System - IPEDS), the Department determined that WGTC had a high annual dropout rate. A random sample of 15 files was selected for review in the 2012-2013 and 2013-2014 (year to date) award years. Appendix A lists the names and partial social security numbers of the 30 students whose files were examined during the program review.

In addition, 2 files were randomly selected from a list provided by WGTC on site of all students receiving FWS funds. Appendix A lists the names and partial social security numbers of the 2 students (student #31 and #32) whose files were examined during the program review.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning WGTC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve WGTC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

## **C. Findings**

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by WGTC to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Finding 1: Unofficial Withdrawal Policy not Adequately Developed**

**Citation:** When a recipient of Title IV grant or loan funds withdraws from a school (officially or unofficially) after beginning attendance, the amount of Title IV funds earned by the student must be determined. R2T4 calculations are based on a statutory formula developed by the Department and must be used on all recipients of FSA funds. The formula is based, in part, on the amount of time a student actually spent in attendance at the school. If the amount disbursed to the student is *greater* than the amount the student earned, unearned funds must be returned no later than 45 days after the date the institution determined that the student withdrew. If the amount disbursed

to the student is *less* than the amount the student earned, and for which the student is otherwise eligible, the student may be eligible to receive a post-withdrawal disbursement of the earned aid not received. See 34 § C.F.R. 668.22

The withdrawal date for a student who ceases attendance at an institution that is not required to take attendance is:

- The date, as determined by the institution, that the student began the withdrawal process or provided official notification to the institution, in writing or orally, of his or her intent to withdraw;
- If the student ceases attendance without providing official notification to the institution of his or her withdrawal, the mid-point of the payment period; or
- If the institution determines that a student did not begin the withdrawal process or otherwise provide official notification of his or her intent to withdraw because of illness, accident, grievous personal loss, or other such circumstances beyond the student's control, the date that the institution determines is related to that circumstance.

With respect to unofficial withdrawals, DCL GEN-04-03 dated November 2004 states that schools must have a procedure for determining whether a Title IV recipient who began attendance during the period actually completed the period, or if the recipient should be treated as a withdrawal. If a student earns a passing grade in one or more of his/her classes during the period for that class, the school can presume that the student completed the course, and thus the period. However, if a student who began attendance and did not officially withdraw fails to earn a passing grade in at least one course offered over an entire period, the school *must* assume, for Title IV purposes, that the student has unofficially withdrawn (unless the school can document that the student completed the period). When a student unofficially withdraws from an institution that is not required to take attendance, the institution may use either the student's last date of attendance (LDA) at an academically related activity *or* the midpoint of the payment period as the student's withdrawal date.

**Noncompliance:** WGTC's unofficial withdrawal policy is not adequately developed. WGTC's withdrawal policy concerning unofficial withdrawals states:

---

*"Students receiving Title IV funds (Pell and FSEOG) who completely withdraw from all classes during the semester are subject to a refund of a portion of the award. The percentage of the award to be refunded will depend on the student's formal withdrawal date, or the last recorded date of class attendance provided by their instructor, if the student drops without filing the drop formal paperwork."*

WGTC's grade point average description states:

*W (Withdraw) – This grade signifies that a student has officially withdrawn by the midpoint of semester.*

*WF (Withdraw Failing) – This grade indicates that a student officially withdrew after the midpoint of the semester.*

*WP (Withdraw Passing) – This grade of WP is given only to students with extenuating circumstances. This grade indicates that a student was passing when he or she officially withdrew after the midpoint of the semester.*

WGTC is not required to take attendance by any outside agency, nor are faculty required to take attendance by the institution's policies or procedures. Also, since there are no grade descriptions for students who unofficially withdraw, the reviewers were not clear on how the institution determined grades for these students. The school did not have a policy to determine the last date of attendance for a student who began attendance and did not officially withdraw and failed to earn a passing grade in at least one course.

There were 2 students in our sample who failed to earn a passing grade in at least one course and the reviewers could not determine if the student actually completed the period, or if the recipient should be treated as a withdrawal:

Student 25: In the Spring 2014 semester, student #25 was enrolled in 4 classes and withdrew from 3 of those classes. For the withdrawn classes, the student received 2 "W"s and 1 "WF". In one class, the instructor gave the student a grade of "F" on May 6, 2014. WGTC could not produce any documentation to support the "F" grade. There was no R2T4 worksheet in the student's file. Student #25 received \$1,882 in Pell grant funds.

Student 26: In the Summer 2013 semester, student #26 was enrolled in 4 classes and withdrew from 1 of those classes. For the withdrawn class, the student received a "W" grade. In the other 3 classes, the instructors gave the student grades of "F". WGTC could not produce any documentation to support the "F" grades. There was no R2T4 worksheet in the student's file. Student #25 received \$1,850 in Pell grant funds.

**Required Action:** ~~Due to the error rate for this material finding being greater than the~~ established limit and the systematic nature of this material finding, the institution must determine the exact amount of institutional liability associated with this finding. The institution is required to perform a 100% file review of all of the Title IV recipients who failed to earn a passing grade in at least one course for the 2013-2014 award year and identify if the recipient should be treated as a withdrawal. For all students who are deemed to have completed the period but earned a "F", WGTC must submit documentation to support the grade earned (final exam, attendance records, homework, etc.)

The Institution must provide the following information:

1. Student last name

2. Student first name
3. SSN (last 4 digits)
4. Award Year (2013-2014)
5. Program—(Pell, DL-Subsidized, DL-Unsubsidized, FSEOG, etc.)
6. Date of Title IV Funds Disbursed
7. Disbursed Amount
8. Last Date of Attendance
9. Date of Withdrawal
10. Date of Determination
11. Original Return Calculation Amount
12. Revised Return Calculation Amount
13. Amount Already Returned
14. Percentage of Title IV student earned ( use decimal point rounded to 3 decimal places)
15. Date School Refunded Funds
16. Statutory Refund Due Date
17. Late Refund (Yes/No)
18. Additional Amount to be Returned, if any

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at [Angelique.James@ed.gov](mailto:Angelique.James@ed.gov) within 60 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

Please mail any necessary documents to:

Angelique James  
Senior Institutional Review Specialist  
U.S. Department of Education  
Federal Student Aid  
61 Forsyth Street SW  
Room 18T40  
Atlanta, GA 30303

WGTC must also update its current withdrawal policy to include a revised policy for unofficial withdrawals to reflect the requirements of DCL GEN-04-03. This new policy must be provided to this office with WGTC's response to this finding.

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter

## **Finding 2: Satisfactory Academic Progress not Adequately Monitored**

**Citation:** 34 C.F.R. § 668.16 of the Student Assistance General Provisions regulations stipulates, in part, that an institution must establish, publish and apply reasonable standards for measuring whether a student, who is otherwise eligible for aid under any Title IV program is maintaining satisfactory academic progress (SAP) in his or her course of study.

Schools that check SAP at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may do this without appeal or any other action by the student. Warning status lasts for one payment period, during which the student may continue to receive Title IV funds. Students who are still failing to make satisfactory progress after the warning period lose their Title IV eligibility unless they successfully appeal and are placed on probation. Schools do not need to have warnings; they can instead require students to immediately appeal to be placed on probation.

*Federal Register, October 29, 2010*

Other than when a student is placed on financial aid warning or probation or has agreed to an academic plan as outlined above, he can regain eligibility only by taking action that brings him into compliance with your school's satisfactory progress standards. Neither paying for one's classes nor sitting out for a term affects a student's academic progress standing, so neither is sufficient to reestablish aid eligibility.

*Federal Student Aid Handbook, Volume 1, 1-11*

**Noncompliance:** The institution's SAP policy states:

"To maintain eligibility for financial aid, students must stay in good academic standing by maintaining a 2.0 cumulative GPA and must have at least a 2.0 grade point average at the end of each semester on the scheduled credit hours attempted."

The reviewers found 5 students who were not placed on a financial aid warning even though the student was not making satisfactory academic progress.

**Student 5:** For Fall 2013, the student's GPA was 1.6 and the student should have been placed on financial aid warning for the next semester (Spring 2014). There was no documentation in the student's file to indicate that the student was placed on financial aid warning.

**Student 9:** For Fall 2012, the student's GPA was 0.46 and the student should have been placed on financial aid warning for the next semester (Spring 2013). For Spring 2014, the student's GPA was 1.09 and the student should have been placed on financial aid warning for the next semester (Summer 2014). There was no documentation in the student's file to indicate that the student was placed on financial aid warning.

- Student 16: For Fall 2013, the student's GPA was 0.5 and the student should have been placed on financial aid warning for the next semester (Spring 2014). There was no documentation in the student's file to indicate that the student was placed on financial aid warning.
- Student 17: For the Spring 2011 quarter, the student's GPA was 0.0. The student stopped attending after this semester. The student began attending again for the Summer 2013 semester and should have been placed on financial aid warning. There was no documentation in the student's file to indicate that the student was placed on financial aid warning.
- Student 19: For Spring 2012, the student's GPA was 1.0 and the student should have been placed on financial aid warning for the next semester (Summer 2012). There was no documentation in the student's file to indicate that the student was placed on financial aid warning.
- Student 27: For Summer 2013, the student's GPA was 0 (student attempted 6 credit hours and withdrew from 6 credit hours receiving a "W" in both classes). The student stopped attending after this semester. The student began attending again for the Fall 2013 semester and should have been placed on warning at the beginning of this semester, but wasn't placed on warning until October of 2013.

**Required Action:** WGTC must submit financial aid warning documentation for the above mentioned students.

### **Finding 3: Return to Title IV (R2T4) Not Made**

**Citation:** Federal regulations require refunds to be deposited to the Title IV, FSA account(s) or to be returned to the appropriate lender within 45 days after the date the Institution determines the student withdrew.

As defined by section 34 C.F.R. § 668.173 of the Student Assistance General Provisions, the return of Title IV funds is timely if—

- (1) An Institution deposits or transfers the funds into the bank account it maintains no later than 45 days after the date it determines that the student withdrew;
- (2) An Institution initiates an electronic funds transfer (EFT) no later than 45 days after the date it determines that the student withdrew;
- (3) An Institution initiates an electronic transaction, no later than 45 days after the date it determines that the student withdrew, that informs an FFEL lender to adjust the borrower's loan account for the amount returned; or
- (4) An Institution issues a check no later than 45 days after the date it determines that the student withdrew. However, the Department considers that an Institution did not satisfy this requirement if records indicate the date on the cancelled refund check shows that the



bank endorsed that check more than 45 days after the date the Institution determined that the student withdrew.

**Noncompliance:** The institution did not return funds back to the Department for 2 withdrawn students.

Student 5: In the Spring 2013 semester, student #5 was enrolled in 1 class and withdrew. For the withdrawn class, the student received a "W". There was no R2T4 worksheet in the student's file. Student #25 received \$925 in Pell grant funds on 6/5/13.

Student 27: In the Summer 2013 semester, student #27 was enrolled in 2 classes and withdrew from both. For the withdrawn classes, the student received W's. The R2T4 worksheet indicated that the student's scheduled last date of attendance was 7/17/13, however the student's course registration form showed "status dates" of 6/3/13 and 6/10/13. The R2T4 worksheet indicated that the Title IV aid that should have been returned was \$575.17. Student #27 received \$925 in Pell grant funds on 6/5/2013 and no funds were returned to the Department.

When asked why the R2T4's were not made for these students, the FAD stated that this finding was due to a BANNER issue. This finding was also cited in the institution's 2013 audit. A Preliminary Audit Determination Letter (PADL) was issued to WGTC on June 25, 2014. In the PADL, WGTC was required to perform a R2T4 file review for the 2012-2013 awards year. This file review was required for Title IV recipients who withdrew to determine the full extent of incorrect, late and unmade refunds. Due to this requirement, WGTC will not be required to perform a file review for this finding.

**Required Action:** WGTC must revise its R2T4 policies and procedures to include the required timeframe to return funds pursuant to 34 C.F.R. § 668.173. This revised policy must be provided to this office with WGTC's response to this finding.

#### **Finding 4. Federal Work Study Violations-Student Working during class hours**

**Citation:** Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program, an institution must pay a student FWS compensation at least once a month. It is the school's responsibility to monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

**Noncompliance:** The institution failed to monitor FWS time sheets adequately. Three out of 3 FWS students performed FWS jobs while scheduled for class as illustrated below:

Student #28 For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 8/12/13 to 9/10/13 indicates that on 8/13/13 and 8/15/13, the student worked from 8:30am to 7:00pm and 9:30am to 7:00pm respectively. According

to the class schedule, the student's class schedule was Tuesday and Thursday from 11:00am to 12:15pm.

- Student #31 For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 12/10/13 to 1/9/14 indicates that on 1/8/14, the student worked from 8:30am to 7:00pm. According to the class schedule, the student's class schedule was Monday and Wednesday from 11:00am to 12:15pm. Also, the time report form also showed that the student worked on 1/7/14 and 1/8/14 for 11.25 and 103.5 hours with no breaks.
- Student #32 For the 2012/2013 award year, the student worked FWS hours during the same period classes were scheduled. A review of the payroll period of the time report form from 11/11/13 to 12/9/13 indicates that on 11/12/13 and 11/14/13, the student worked from 8:30am to 7:00pm. According to the class schedule, the student's class schedule was Tuesday and Thursday from 11:00am to 12:15pm and 12:30pm to 1:45pm respectively.

**Required Action:** In its response, WGTC must provide documentation that students listed above were not scheduled for classes while working a FWS job.

Due to the significant error rates based on the sampling of the student files tested for the award year, WGTC must determine the extent of non-compliance associated with this finding. The institution is required to perform a full file review for all of the 2013/2014 FWS recipients. File reviews must be performed for all FWS recipients including FWS students in the Appendix A of this Program Review Report for the respective award year to identify all FWS students who worked during scheduled class hours.

Submit the results of this review in an electronic Excel spreadsheet. **Return the file to Angelique James by e-mail at [Angelique.James@ed.gov](mailto:Angelique.James@ed.gov) within 60 days of receipt of this letter.** This data will contain personally identifiable information and must be emailed as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) must be sent in a separate email.

Along with the file review required for Finding 4, WGTC must develop a policy to ensure FWS students are not working during scheduled class times. This policy must detail how the financial aid office will be informed of student class schedules and the methods financial aid will use to determine if students are working during class hours. A copy of the procedures should be submitted in response to this report.

Repayment instructions, if any will be addressed in the Final Program Review Determination Letter.

**Finding 5. Federal Work Study Violations -Timesheet Violations/ Improper Payment to Students**

**Citation:** Pursuant to 34 C.F.R. § 675.16, the institution must make direct Federal Work Study (FWS) payments to students and handle the return of FWS funds that are not received or negotiated by a student. Regardless of who employs the student, the institution is responsible for ensuring that the student is paid for work performed. A student's FWS compensation is earned when the student performs the work.

**Noncompliance:** The institution failed to monitor FWS time sheets adequately. Time sheet hours were not accurately calculated.

Student 28: The student's payroll time sheet for the week of 6/11/13 to 6/19/13 shows hours worked of 3.5 on 6/13/13; however the student worked from 8:30 am to 1:00pm which is 4.5 hours.

Student 31: The student's payroll time sheet for the week of 11/10/13 to 12/8/13 shows hours worked of 8.25 on 11/12/13 and 11/13/13; however the student worked from 8:30 am to 5:40pm which is 8.16 hours.

**Required Action:** In its response, WGTC must provide documentation to resolve the time sheet discrepancies listed above.

WGTC must also prepare federal work study procedures on how to address monitoring FWS time sheets. These procedures must include financial aid's role in FWS monitoring of timesheets and disbursement of funds. This policy must also address how such errors as the ones listed above will be handled if identified in the future. A copy of these new procedures must be submitted to this office in response to this finding.

**Finding 6: Verification Violations**

**Citation:** 34 C.F.R. § 668.59(a) states that an institution shall require each applicant whose application for verification is selected for verification on the basis of edits specified by the Secretary, to verify all of the applicable items and if the information on an application changes as a result of the verification process, the application is resubmitted for corrections to the Institutional Student Information Record (ISIR)/ Student Aid Report (SAR).

**Noncompliance:** While reviewing WGTC's student files, the reviewers found that the institution did not properly verify 3 students.

Student 22: For 2013/2014, the student's ISIR showed U.S. tax paid of \$191; however the tax transcript shows tentative tax per computer as \$598.

Student 26: For 2012/2013, the student's ISIR shows a student's adjusted gross income of \$28,937, U.S. income tax paid of \$0 and untaxed income of \$0; however there was no tax documentation in the student's file.

Student 30: For 2013/2014, the student's verification tracking flag was V1/standard. Student 30's ISIR shows a student's adjusted gross income of \$2,856; however there was no documentation in the file to verify the AGI.

**Required Action:** WGTC must submit documentation to the Department indicating that students #22, #26 and #30 have been properly verified.

#### **Finding 7: Exit Counseling Deficiencies**

**Citation:** 34 C.F.R. § 685.304 (b) states that an Institution must ensure that exit counseling is conducted with each Stafford loan borrower either in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that this counseling is conducted shortly before the student borrower ceases at least half-time study at the school, and that an individual with expertise in the title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. If a student borrower withdraws from school without the school's prior knowledge or fails to complete an exit counseling session as required, the school must ensure that exit counseling is provided through either interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

**Noncompliance:** There was no exit counseling documentation in the file for student #3, #4, #8, #12, #15, #19, #23, and #24. The institutions academic year is standard terms (Fall/Spring/Summer) for 38 weeks. The FAD stated that students that attend the Fall and Spring semester but do not attend the Summer semester were assumed to be returning in the Fall even though they had not registered. The reviewers informed the staff that if the student had attended the Fall and Spring semester but had not registered for the Summer, the student should be considered a withdrawn student and exit counseling must be completed within 30 days.

**Required Action:** WGTC must provide documentation that exit counseling has been conducted for the students listed above (student #3, #4, #8, #15, #19, #23, and #24). This documentation must be provided to this office with WGTC's response to this finding.

#### **Finding 8: Satisfactory Academic Progress Policy Inadequate**

**Citation:** 34 C.F.R. § 668.16 of the Student Assistance General Provisions regulations stipulates, in part, that an institution must establish, publish and apply reasonable standards for measuring whether a student, who is otherwise eligible for aid under any Title IV program is maintaining satisfactory academic progress (SAP) in his or her course of study.

Schools that check SAP at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may do this without appeal or any other action by the student. Warning status lasts for one payment period, during which the student may continue to receive Title IV funds. Students who are still failing to make satisfactory progress after the warning period lose their Title IV eligibility unless they successfully appeal and are placed on probation. Schools do not need to have warnings; they can instead require students to immediately appeal to be placed on probation.

All schools can have financial aid probation in their satisfactory progress policy. When a student loses FSA eligibility because he failed to make satisfactory progress, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. His appeal must explain why he failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation. You can grant his appeal and put him on probation if you determine that he should be able to meet the standards after the subsequent payment period or if you develop an academic plan that when followed will ensure that he will meet the standards by a specific time. Students who fail the satisfactory progress check after the end of the payment period may only continue to receive aid if they successfully appeal, you develop an academic plan for them and they are meeting the requirements.

*Federal Register, October 29, 2010*

**Noncompliance:** The institution's SAP policy does not have a financial aid probation status, the school automatically places students on financial aid suspension after failing to meet SAP during the financial aid warning status. Also, the institution does not have a SAP policy for students that reenter at a later date after withdrawing.

WGTC's SAP policy states:

"At the end of a student's warning semester, the student must have completed the required number of units and/or raised the GPA to the minimum standards for all courses attempted during that semester to return to good academic standing. If the student fails to achieve academic progress after one semester, the student will be placed on financial aid suspension. A student placed on financial aid suspension is no longer eligible to receive financial aid."

For example, students #25 and #26 were both placed on financial aid warning and then after not meeting SAP for the next semester were both placed on financial aid suspension. Both students never returned after being placed on financial aid suspension. The reviewers were unclear if the student was given the opportunity to successfully appeal and be placed on financial aid probation as there was no documentation in either student's file.

The Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011 require institutions to use the word "probation" for a SAP status resulting as a consequence of not making satisfactory academic progress during a warning status. Students who are still failing

to make satisfactory progress after the warning period lose their Title IV eligibility unless they successfully appeal and are placed on probation. Students must successfully appeal in order to be placed on probation.

Also, WGTC must remember that neither paying for one's classes nor sitting out for a term affects a student's academic progress standing, so neither is sufficient to reestablish aid eligibility. A student who wasn't making SAP and was either on a financial aid warning or probation and reenters would reenter with the same financial aid academic progress as the last attended term. (see Finding 2, student #17).

**Required Action:** WGTC must revise its SAP procedures as it relates to 34 C.F.R. § 668.16 and the Program Integrity regulations published on October 29, 2010 and effective on July 1, 2011. The new SAP procedures must be provided to this office with WGTC's response to this finding.

#### **Finding 9: Late Enrollment Reporting to the National Student Loan Data System**

**Citation:** As noted in 34 C.F.R. § 685.309, schools are required to confirm and report the enrollment status of Title IV student aid recipients to the Department's NSLDS. This process is called Enrollment Reporting (or the Student Status Confirmation Report [SSCR]). One of the important functions of NSLDS is to maintain the enrollment status of Title IV recipients. The accuracy of enrollment reporting by schools is critical for many reasons, including ensuring that the obligations and benefits that the HEA provides for Title IV student loan recipients are respected. NSLDS enrollment information is also used by the Department for a variety of other purposes, including tracking interest subsidy payments; budget allocations; and the evaluation of the Title IV programs.

The accuracy of Title IV student loan records depends on the accuracy of enrollment information reported by schools. Schools must review, update, and verify student enrollment statuses; effective dates of the enrollment status; and; the anticipated completion dates that appear on the Enrollment Reporting roster file or on the Enrollment Maintenance page of the NSLDS Web site. The certification date is the date a school certified the enrollment information.

An institution must have administrative and fiscal controls to timely report data. Upon receipt of an Enrollment Reporting roster file, the institution must complete and return that file to NSLDS within 30 days from the date the roster file was created. However, if a roster file is expected within 60 days (often referred to as batch reporting), a school may provide the updated data on that roster file. Title IV institutions must:

- Recertify enrollment status of all students on the enrollment roster even if there is no change in enrollment status.
- Provide completion/graduation data accurately and timely when students complete their academic program.

- Accurately and timely report students with a less than half-time enrollment status.
- Add transfer students who have received Title IV aid elsewhere to their enrollment roster even if the students are not receiving aid at your school.
- Provide an Anticipated Completion Date (ACD) for students.

Please refer to the Department's Dear Colleague Letter (DCL-GEN-12-06, March 30, 2012) for additional requirements regarding NSLDS Enrollment Reporting.

**Noncompliance:** The certification date of enrollment status as reported in NSLDS for the majority of the students in the sample was up to several months late.

Title IV schools are ultimately responsible for timely and accurate reporting, even when they use an enrollment reporting servicer to submit enrollment reporting files. Schools may perform internal oversight or may receive a request for an audit history of enrollment reporting. Also, NSLDS provides tools for a school to monitor certification records that have been provided to NSLDS by the school or its servicer. Schools that do not comply may have their eligibility for Title IV aid revoked, or they may have fines imposed.

**Required Action:** WGTC must ascertain why certification dates provided to the National Student Clearinghouse and/or NSLDS do not appear as timely in NSLDS. Please submit a response to explain how a correction will be made in order to ensure that student enrollment data is timely reported to NSLDS in the future. This documentation must be provided to this office with WGTC's response to this finding.

#### **Finding 10. Financial Aid Packaged Incorrectly/Full Eligibility not Awarded**

**Citation:** Pursuant to 34 C.F.R. § 668.165, an institution must notify a student of the amount of funds the student and his or her parent is eligible to receive from each FSA program, and how and when the funds will be disbursed. The notification must be sent before the disbursement is made. If the funds include Direct Loan or FFEL Program funds, the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans. If Perkins, Stafford or PLUS loan funds are being credited to a student's account, the institution must also notify the student or parent in writing of the following:

- anticipated date and amount of the disbursement;
- student's (or parent's) right to cancel all or part of the loan or disbursement
- procedures and the deadline by which the student (or parent) must notify the school that he or she wishes to cancel the loan or disbursement

If the school obtains affirmative confirmation, the notification must be sent no earlier than 30 days prior, and no later than 30 days after crediting the student's account. If the institution does not obtain affirmative confirmation, the notification must be sent no earlier than 30 days prior and no later than seven days after crediting the student's account.

The Higher Education Act of 1965 addresses the refusal or adjustment of loans. Section 479A(c) states the following:

*"On a case-by-case basis, an eligible institution may refuse to certify a statement that permits a student to receive a loan under part B or D, or may certify a loan amount or make a loan that is less than the student's determination of need (as determined under this part), if the reason for the action is documented and provided in written form to the student. No eligible institution shall discriminate against any borrower or applicant in obtaining a loan on the basis of race, national origin, religion, sex, marital status, age, or disability status."*

Similarly, 34 C.F.R. § 682.603 states that a school may refuse to certify a Stafford or PLUS loan or may reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing, provided that the determination is made on a case-by-case basis; and the documentation supporting the determination is retained in the student's file.

Schools do not have the authority to limit the amount of Title IV aid that an individual student may receive on a categorical basis. In addition to this, the school may not limit a student's and or parent's FFEL loan borrowing to the amounts needed to cover only institutional costs, or to a certain percentage of direct costs and/ or indirect costs if borrowers would qualify for additional loan funds.

**Noncompliance:** WGTC categorically limited the amount of funds that Title IV recipients were eligible to receive in the form of Direct Loans. Students were awarded, in most cases, up to direct costs, rather than the Cost of Attendance (COA). Additionally, WGTC failed to provide adequate financial aid counseling to students which resulted in students not being made aware of their full loan amount for which they were eligible to receive. The student's award letters or any other student specific documentation did not display student's full eligibility of direct loans.

When asked about this issue, the FAD stated that some students who receive loan disbursements fill out a federal direct loan request form which asks the student to fill in the total requested loan amount. Although this form lists the federal direct loan maximum annual loan limits, it does not display each student's specific federal direct loan eligibility.

In the sample of 32 students, no student received their maximum eligibility of subsidized and unsubsidized loans.

**Required Action:** WGTC must notify all Title IV recipients of the full amount he or she is eligible to receive, and how and when those funds will be disbursed. Students must be made aware of all eligible direct loans funds and have the right to cancel all or part of the loan or disbursement.

Additionally, WGTC must develop policies and procedures for ensuring that students are counseled and notified of the total amount of Title IV aid they are eligible to receive, and how



and when that amount will be paid. The notification must permit the student to accept, reject, or reduce the amount of the loan. A copy of the notification of disbursement, and the new policies and procedures must be submitted to this office in response to this finding.

**Finding 11: Attendance Policy Inadequate**

**Citation:** 34 C.F.R. § 668.32(d), Student Assistance General Provisions, states that the school must establish and maintain records required under this part and the individual Title IV, HEA program regulations for purposes of determining student eligibility for assistance under the Title IV, HEA program. This eligibility requirement includes tracking attendance at a clock or credit hour school.

34 C.F.R. 668.22, General Provisions, states when a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date in accordance with paragraph (e) of 668.22.

**Noncompliance:** The institution relied on its faculty to timely and accurately identify students who unofficially withdrew. However, there was no institutional policy that required faculty to take attendance. When asked about this discrepancy in the entrance conference, it was stated that some faculty took attendance and other faculty did not take attendance.

WGTC's attendance policy states:

"A student may be dropped from a course in which the number of his or her absences, whether excused or unexcused exceeds 20 percent of the total number of course meetings in the semester"

There is a discrepancy between the attendance policy and the actual attendance procedures that the institution is following. The reviewers were unsure how this attendance policy could be monitored if attendance taking was not a requirement of the institution and all faculty did not take attendance.

**Required Action:** WGTC must submit documentation to resolve this discrepancy between the attendance policy and WGTC's actual attendance procedures. This documentation must be provided to this office with WGTC's response to this finding.

**Finding 12: Bank Account not Designated as "Federal Funds" Account**

**Citation:** 34 C.F.R. § 668.163(a) states that an institution must maintain Title IV, HEA program funds in a bank or investment account that is Federally insured or secured by collateral of value reasonably equivalent to the amount of those funds. For each bank or investment account that includes title IV, HEA program funds, an institution must clearly identify that title IV, HEA

program funds are maintained in that account by including in the name of each account the phrase "Federal Funds"; or notifying the bank or investment company of the accounts that contain Title IV, HEA program funds and retaining a record of that notice; and except for a public institution, filing with the appropriate State or municipal government entity a UCC-1 statement disclosing that the account contains Federal funds and maintaining a copy of that statement.

**Noncompliance:** The reviewers did not see that the bank account in which Title IV funds were maintained had "Federal Funds" in the name or a record of notice notifying the bank that the account contained Title IV funds.

**Required Action:** WGTC is required to submit documentation to comply with 34 C.F.R. § 668.163(a). This documentation must be provided to this office with WGTC's response to this finding.

\_\_\_\_\_

Appendix H - Cost of Funds  
WGTC OPEID: 010487

FSEOG	\$	-	\$	-
Perkins	\$	-	\$	-
FWS-50% Match	\$	-	\$	-
FWS-No Match	\$	11,302.00	\$	11,302.00
FSEOG-No Match	\$	-	\$	-
Perkins-No Match	\$	-	\$	-
Total Campus-Based	\$	11,302.00	\$	11,302.00

FSEOG  
Perkins  
FWS-50% Match  
FWS-No Match  
FSEOG-No Match  
Perkins-No Match


Interest Breakdown	
Pell Grant	\$ 248.53
FSEOG	\$ -
Perkins	\$ -
ACG	\$ -
SMART	\$ -
TEACH	\$ -
FSEOG-No Match	\$ -
Perkins-No Match	\$ -



# Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

**Institution:** West Georgia Technical College

**City, State:** Waco, GA

**PRCN:** 2014-3-04-28631

**TIN:** 581656795

**DUNS:** 833122976

**Reviewer:** Angelique James

**Region:** Atlanta

**Date:** April 27, 2015

## Section A - Use if no adjustments are being made in COD

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

FSEOG (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

FWS (No FISAP Corrections)	Principal	\$11,302	3220RNOYR	69017
	Interest	\$147	1435RNOYR	64020

Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest		4253XNOYR	53040

## Section B: Use if the Institution is instructed to make adjustments in COD

Add rows if necessary	Program		Amount	Funding Code	Object Class	G5 Program Award # *
Pell, ACG, SMART, TEACH	Pell 2013-2014	Principal	\$33,400	3875FNOYR	69020	P063P133348
Pell, ACG, SMART, TEACH	Pell 2013-2014	Imputed Interest	\$256	1435RNOYR	64020	P063P133348
Direct Loan (do not use for estimated loss)	DL 2013-2014	Principal	\$29,925	3875FNOYR	69020	P268K143348
	DL 2013-2014	Imputed Interest	\$251	4253XNOYR	53040	P268K143348